UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

1:15-cr-00287-JSR

- against -

SEAN STEWART,

Defendant.

DECLARATION OF STEVEN M. WITZEL IN SUPPORT OF DEFENDANT'S OPPOSITION TO THE GOVERNMENT'S MOTION IN LIMINE TO PRECLUDE CERTAIN EXPERT TESTIMONY

Steven M. Witzel declares under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

- 1. I am a member of the law firm of Fried, Frank, Harris, Shriver & Jacobson LLP and counsel of record for Defendant Sean Stewart in the above-captioned action. I respectfully submit this declaration in support of Mr. Stewart's opposition to the government's motion *in limine* to preclude certain expert testimony.
- 2. Attached hereto as **Exhibit A** are true and correct copies of excerpts of the August 8, 2016 trial transcript in *United States v. Sean Stewart*, No. 15-cr-00287 (S.D.N.Y.).

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 29, 2019 in New York, New York.

/s/ Steven M. Witzel
Steven M. Witzel
steven.witzel@friedfrank.com